

## REMARKS

The Applicants respectfully request reconsideration of this application in view of the above amendments and the following remarks.

### Allowable Subject Matter

As an initial matter, the Applicants would like to thank the Examiner for the careful search and for finding allowable subject matter. The Examiner has allowed claims 10-14. These claims are presented herein.

### 35 U.S.C. §102(a) Rejection - Ivanov

The Examiner has rejected claims 1-2, 5 and 7-8 under 35 U.S.C. §102(a) as being anticipated by the article "Texture Compression Survey" by Ivanov (hereinafter "Ivanov"). The Applicants respectfully submit that the present claims are allowable over Ivanov.

Claim 1 pertains to:

*"A method comprising, for each of a plurality of blocks in an image, generating compressed information including information representing a single color value and information representing a plurality of color palette indices including at least one color palette index to a color represented in compressed information for another block in the image".*

Ivanov does not teach or suggest these limitations. In particular, Ivanov does not teach or suggest: (a) that the compressed information for a block include information representing a single color value; and (b) that the color palette indices include at least one color palette index to a color represented in compressed information for another block in the image.

Firstly, Ivanov discusses that *"each block also has two (emphasis added) representative 16 bit colors in RGB565 format associated with it"*. See e.g., page 3 of Ivanov. In contrast, claim 1 recites that the compressed information includes information *"representing a single color value"*.

Secondly, Ivanov discusses that there are four colors for a 4x4 block of texels. These four colors include *"two explicitly encoded colors, plus two additional colors that are derived by uniformly interpolating the explicitly encoded colors, form a four color lookup table"*. See e.g., about 1/3 down on page 3 of Ivanov. Furthermore, *"A two-bit index is signed to each of the 16 texels"*. See e.g., the middle of page 3 of Ivanov. Accordingly, each index is to one of the four colors corresponding to the block. In contrast, claim 1 recites *"a plurality of color palette indices including at least one color palette index to a color represented in compressed information for another block in the image"*.

For at least one or more of these reasons, claim 1 and its dependent claims are believed to be allowable over Ivanov.

Independent claim 8 is believed to be allowable over Ivanov for one or more similar reasons.

### 35 U.S.C. §102(a) Rejection - Cross

The Examiner has rejected claims 1-2, 5 and 7-8 under 35 U.S.C. §102(a) as being anticipated by the article "DXTn Texture Compression" by Cross (hereinafter "Cross"). The Applicants respectfully submit that the present claims are allowable over Cross.

Claim 1 pertains to:

*"A method comprising, for each of a plurality of blocks in an image, generating compressed information including information representing a single color value and information representing a plurality of color palette indices including at least one color palette index to a color represented in compressed information for another block in the image"*.

Cross does not teach or suggest these limitations. In particular, Cross does not teach or suggest: (a) that the compressed information for a block include information representing a single color value; and (b) that the color palette indices include at least one color palette index to a color represented in compressed information for **another block** in the image.

Firstly, Cross discusses that *"When compressing the texture using DXtn, first the pixels are examined, and two colors are chosen. Then two more colors in-between these two are calculated (by uniformly interpolating the two first colors)"*. See e.g., about two-thirds down on page 2 of Cross. In contrast, claim 1 recites that the compressed information includes information *"representing a single color value"*.

Secondly, Cross discusses that *"There are now a total of four colors to represent these 16 pixels with"*. See e.g., about two-thirds down on page 2 of Cross. Accordingly, as understood by Applicants, each pixel of a block indexes into one of the four colors for that block (two chosen and two calculated). In contrast, claim 1 recites *"a plurality of color palette indices including at least one color palette index to a color represented in compressed information for another block in the image"*.

For at least one or more of these reasons, claim 1 and its dependent claims are believed to be allowable over Cross.

Independent claim 8 is believed to be allowable over Cross for one or more similar reasons.

### 35 U.S.C. §103(a) Rejection - Ivanov, Iyama

The Examiner has rejected claims 31-32 under 35 U.S.C. §103(a) as being unpatentable over Ivanov in view of U.S. Patent No. 5,327,264 issued to Iyama (hereinafter "Iyama"). Without admitting that these references should be combined, the Applicants respectfully submit that the present claims are allowable over Ivanov and Iyama.

Claim 31 pertains to a computer system comprising:

*"a bus;*

*a memory coupled to the bus;*

*a network interface device coupled to the bus;*

*a processor coupled to the bus; and*

*instructions stored on a machine-readable medium that when executed cause the processor to generate compressed texture information for a block in an image, the compressed texture information including information representing a single color value and information representing a plurality of color palette indices including an index to a color value associated with another block in the image”.*

Ivanov does not disclose or render obvious these limitations. The discussion above is pertinent to this point. Iyama does not remedy what is missing from Ivanov.

For at least one or more of these reasons, claim 31 is believed to be allowable over Ivanov and Iyama.

### 35 U.S.C. §103(a) Rejection - Cross, Iyama

The Examiner has rejected claims 31-32 under 35 U.S.C. §103(a) as being unpatentable over Cross in view of Iyama. Without admitting that these references should be combined, the Applicants respectfully submit that the present claims are allowable over Cross and Iyama.

Claim 31 pertains to a computer system comprising:

*“a bus;*

*a memory coupled to the bus;*

*a network interface device coupled to the bus;*

*a processor coupled to the bus; and*

*instructions stored on a machine-readable medium that when executed cause the processor to generate compressed texture information for a block in an image, the compressed texture information including information representing a single color value and information representing a plurality of color palette indices including an index to a color value associated with another block in the image”.*

Cross does not disclose or render obvious these limitations. The discussion above is pertinent to this point. Iyama does not remedy what is missing from Cross.

For at least one or more of these reasons, claim 31 is believed to be allowable over Cross and Iyama.

### Conclusion

In view of the foregoing, it is believed that all claims now pending patentably define the subject invention over the cited art of record and are in condition for allowance. Applicants respectfully request that the rejections be withdrawn and the claims be allowed at the earliest possible date.

### Request For Telephone Interview

The Examiner is invited to call Brent E. Vecchia at (303) 740-1980 if there remains any issue with allowance of the case.

### Request For An Extension Of Time

The Applicants respectfully petition for an extension of time to respond to the outstanding Office Action pursuant to 37 C.F.R. § 1.136(a) should one be necessary. Please charge our Deposit Account No. 02-2666 to cover the necessary fee under 37 C.F.R. § 1.17 for such an extension.

### Charge Our Deposit Account

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Dated: 11/26/07

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